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November 2, 2011

The Honorable Jocelyn Boyd Chief Clerk of the Commission Public Service Commission of South Carolina Post Office Drawer 11649 Columbia, South Carolina 29211

Re: AT&T South Carolina's Petition Requesting the Commission's Intervention in Numbering Resources Determinations – Union Rate Center – Wallace Thomson Hospital Docket No.

Dear Ms. Boyd:

BellSouth Telecommunications, LLC d/b/a AT&T South Carolina ("AT&T South Carolina") respectfully encloses for filing a Petition for Review of Numbering Resources Determination in the Union Rate Center in the above-captioned matter.

By copy of this letter, I am serving a copy of this document on all parties of record as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nml Attachment 963867

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

In Re:	AT&T SOUTH CAROLINA'S	`
	PETITION REQUESTING THE COMMISSION'S	
	INTERVENTION IN NUMBERING RESOURCES	Š
	DETERMINATIONS	
		Ś

PETITION FOR REVIEW OF NUMBERING RESOURCES DETERMINATION IN THE UNION RATE CENTER

BellSouth Telecommunications, LLC d/b/a AT&T South Carolina ("AT&T South Carolina"), pursuant to rules adopted by the Federal Communications Commission ("FCC") for challenging numbering determinations, petitions the Public Service Commission of South Carolina ("Commission") for review of a recent denial of AT&T South Carolina's application for use of numbering resources in the 864 area code. Numbering determinations are made by the North American Numbering Plan Administrator ("NANPA") and/or the Pooling Administrator ("PA"), depending on the nature of the numbering request. The FCC's rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading "Central office code administration," and the FCC's Orders addressing these matters allow for challenges of determinations by both entities. Accordingly, this Petition addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to provide the requested relief to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so. The denial that is the subject of this Petition impacts AT&T South Carolina customer Wallace Thomson Hospital.

In support of this Petition, AT&T South Carolina states:

See, e.g., 47 C.F.R. §52.15.

See Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, Numbering Resource Optimization; etc., 17 FCC Rcd 252, ¶61 (2001) ("Third NRO Order").

- 1. AT&T South Carolina is a telephone utility that provides, among other things, intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Union exchange.
- 2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP").³
- 3. The PA is an independent non-governmental entity that is responsible for administering thousands-block number pooling.⁴
- 4. On March 31, 2000, the FCC issued an Order relating to numbering resource optimization.⁵ The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers.
- 5. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant's rate center will be exhausted within six months of the application. The FCC reaffirmed this requirement in two subsequent orders.⁶ Prior to this ruling, the Central Office Code Assignment Guidelines used to make code assignments required the applicant's existing number inventory within the applicant's serving switch to

³ See 47 C.F.R. § 52.13 (a), (b).

See 47 C.F.R. §52.7(g). See also 47 C.F.R. §52.20 ("Thousands-block number pooling is the process by which the 10,000 numbers in a central office code (NXX) are separated into ten sequential blocks of 1,000 numbers each (thousands-blocks), and allocated separately within a rate center.").

See Report and Order and Further Notice of Proposed Rule Making, Numbering Resources Optimization, 15 FCC Rcd 7574 (2000) ("First NRO Order").

See Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, Numbering Resource Optimization, 16 FCC Rcd 306 at ¶29 (2000) ("Second NRO Order"); Third NRO Order at ¶48-49.

exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

- 6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center.⁷ The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.⁸
- 7. On or about October 26, 2011, AT&T South Carolina submitted a Pooling Administration System request for the assignment of two thousands-blocks in the Union exchange for its customer's new phone system. In order to meet the customer's express request for numbers, AT&T South Carolina requested the assignment of two consecutive thousands-blocks in the 864 NPA, specifically 864-NXX-2XXX and 864-NXX-3XXX. As AT&T South Carolina does not have the existing numbers to meet the customer's request, AT&T South Carolina is requesting that the numbers be assigned to it.
- 8. AT&T South Carolina's application was completed in accordance with Industry Numbering Committee ("INC") guidelines, and AT&T South Carolina filled out the necessary Monthto-Exhaust Certification Worksheets as required.

⁷ See Second NRO Order at ¶22; Third NRO Order at ¶¶50-52.

⁸ Third NRO Order at $\P950-52$.

See Exhibit A to this Petition.

See Exhibit B to this Petition.

- 9. At the time of the filing of the numbering resource request, the Union Rate Center had a MTE of 19.438 months and 22.117 months, respectively, for the requested blocks, and a utilization of 56.584%.¹¹
- 10. Thereafter, also on October 26, 2011, AT&T South Carolina's request was denied because AT&T South Carolina had not met the MTE and/or Utilization criterion now set forth in the INC Guidelines. AT&T South Carolina's numbering resource requests were denied despite the fact that AT&T South Carolina does not have adequate numbering resources needed to satisfy this customer's demands in the Union Rate Center.
- 11. AT&T South Carolina's inability to provide this important customer with the requested numbering resources prevents AT&T South Carolina from providing the quality of service this customer desires, needs, and expects. If AT&T South Carolina is not assigned the numbering resources needed to meet the customer's request, AT&T South Carolina will be unable to provide telecommunications services requested by its customer. The refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources." 13
- 12. Both the FCC's rules and the INC Guidelines provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources.¹⁴

See Id.

See Id.

Second NRO Order at \P 61.

See Third NRO Order, Appendix A, Final Rules, § 52.15(g) (4) ("The carrier may challenge the NANPA's decision to the appropriate state regulatory commission"); Third NRO Order at ¶¶ 61-66; Central Office Code (NXX) Assignment Guidelines, INC 95-407-009,§ 13.0 (rev. April 26, 1999)(CO Code Guidelines) ("Appeals may include but are not limited to one or more of the following options: . . .

- 13. Prior to the FCC's Order and the resulting change in the INC Guidelines, the applicable MTE procedures permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under today's procedures, numbering determinations are based on the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief "if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory." In addition, the FCC has ruled that, "States...may grant requests for customers seeking contiguous block of numbers."
- 14. AT&T South Carolina requests that the Commission reverse the decision to withhold numbering resources from AT&T South Carolina because that decision interferes with AT&T South Carolina's ability to provide telecommunication services to its customers as required under South Carolina law.
- 15. This Commission (see Docket No. 2002 –185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review numbering denials and to order the release of number resources to AT&T South Carolina to meet customer needs.

C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body").

¹⁵ Third NRO Order at ¶ 64.

Id.

WHEREFORE, AT&T South Carolina requests that the Commission:

- A. Reverse the decision to deny AT&T South Carolina's request for additional numbering resources;
- B. Direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide two consecutive thousands-blocks in the 864 NPA, specifically 864-NXX-2XXX and 864-NXX-3XXX; and
- C. Grant the requested relief as soon as possible.

Respectfully submitted this and day of November 2011.

Patrick W. Turner

Suite 5200

1600 Williams Street

Columbia, South Carolina 29201

(803) 401-2900

ATTORNEY FOR AT&T SOUTH CAROLINA

963853

Exhibit A



322 West South Street Union, SC 29379 Phone 864 427 0351 Visit us at www.wallacethomson.com

To whom it may concern,

The Union Hospital District would like to request 2,000 consecutive DID numbers in order to supply logistical phone service to our facilities. We have grown to a Hospital, 9 physician clinics, a nursing home, and an EMS facility. In order to provide a more comprehensive and functional customer service environment, we will be installing a new phone system. This system will be expanded to include all facilities. In order to facilitate this type of change, we realize we must have a consecutive group of numbers and would like to have these setup now. We request the range of 2000-3999 if at all possible in a local exchange in Union, SC.

If you have any questions, please feel free to call me on my Cell phone at (864) 426-1492 or email me at bhelmandollar@wallacethomson.com.

Billy Helmandollar

Director of Information Technology

Billy Helmelle 10/11/11

Union Hospital District

Exhibit B

	Pooling Administration System
rw0052@att.com (SF	• Sign Out
	Time : 10/26/2011 05:10:56 PM EDT
頭 ⊞窗Individual Block Requests ⊞廊ICO/NXX Code	Printable Version TBPAG Attachment 1 - March 19, 2007
Requests ⊞ ≨ ĴWithdraw Pending	Thousands-Block Application Form - Part 1A
Requests ⊕ ∰☐Confirm Resources In Service	Tracking <u>864-UNION-</u> Number: <u>SC-491175</u> <u>Full NXX: Pool</u> <u>Replenishment</u>
回题Donate Blocks 回题Submit Forecast 回题Search Forms 回题Reports	Type of Change Application: New i Disconnect
⊞ ∰User Profile	GENERAL APPLICATION INFORMATION 1.1 Contact Information:
	Block Applicant:
	Company BELLSOUTH TELECOMM INC DBA SOUTHERN BELL Name: TEL & TEL
	Headquarters Address: 500 Broad St SE
	City, State, Zip: Gainesville, GA, 30501
	Contact Name: Rena Butticaz
	Contact Address: 500 Broad St SE
	City,State,Zip: <u>Gainesville , GA , 30501</u> Phone: <u>770-</u> FAX: <u>770-945-</u> E-mail: <u>rw0052@att.com</u> 945-9630 9630
	Pooling Administrator: ^{il} Contact
	Name: John Auerbach
	Address: 1800 Sutter St. Ste. 780 City, State, Zip: Concord , CA, 94520
	Phone: <u>925-363-8706</u> FAX: <u>925-363-7684</u> E-mail: <u>John.auerbach@neustar.biz</u>
	1.2 General Information:
	Check one : No LRN needed X LRN needed III
	NPA: 864 LATA: 430 OCN: iv Parent Company's OCN 9417 9400
	Number of Thousands-Blocks Requested : 2

City or Wire Center Name :_	Rate Center: vi UNION
Rate Center Sub Zone:	
1.3 Dates:	
Date of Application: ^{vil} _ 10/26/2011	Requested Block Effective Date: Vili 12/31/2011
possible effective date the Ac	ox, I acknowledge that I am requesting the earliest dministrator can grant. Please note that this only Administrator's processing time, however the request order received.
Request Expedited Treatmer	nt? (See Section 8.6) YesNoX
1.4 Type of Service Provide	er Requesting the Thousands-Block :
a) Type of Service Provide (LEC, IXC, CMRS, Other	er : Incumbent Local Exchange Carrier (ILEC)
	Blocks to be used for : <u>Wireline</u>
c) Thousands-Block(s) (NX 864-xxx-2, 864-xxx-3	(X-X) assignment Preference (Optional)
d) Thousands-Block(s) (N) anv	(X-X) that are undesirable for this assignment, if
e) If requesting a code for	CX-X) that are undesirable for this assignment , if LRN purposes, indicate which block(s) you will be blocks will be given to the pool) N/A
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e) If requesting a code for keeping(the remainder of the keeping(the remainder of the seeping(the remainder of the seeping(the remainder of the seeping(the remainder of the seeping(the seeping)) 1.5 Type of Request: Initial block for rate center: Yeard proof of capability to prove Growth block for rate center: worksheet By selecting this check block in red and explicitly und	LRN purposes, indicate which block(s) you will be blocks will be given to the pool) N/A Yes If Yes , attach evidence of authorization wide service within 60 days. Yes X If Yes , attach months to exhaust who wide that I am willing to accept a derstand that the underlying CO code may not yet be aded in the NPAC on the block effective date.
e) If requesting a code for keeping(the remainder of the keeping(the remainder of the seeping(the remainder of the seeping(the remainder of the seeping(the remainder of the seeping the seeping this check block in red and explicitly undertivated in the PSTN and load Type of change(Mark all that	LRN purposes, indicate which block(s) you will be blocks will be given to the pool) N/A Yes If Yes , attach evidence of authorization wide service within 60 days. Yes X If Yes , attach months to exhaust who wide that I am willing to accept a derstand that the underlying CO code may not yet be aded in the NPAC on the block effective date.
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e) If requesting a code for keeping(the remainder of the leeping(the remainder of the leeping(the remainder of the leeping(the remainder of the leeping(the remainder of the leeping the leeping this check of the leeping this check in red and explicitly und leeping this check in this leeping this check is a contraction of the leeping this check in this leeping this check is a contraction of the leeping this check is a contraction of this leeping	LRN purposes, indicate which block(s) you will be blocks will be given to the pool) YesIf Yes , attach evidence of authorization wide service within 60 days. YesIf Yes , attach months to exhaust who wide service within 60 days. YesXIf Yes , attach months to exhaust who will be accept a derstand that the underlying CO code may not yet be aded in the NPAC on the block effective date. It apply) Yes Switching Id Part 1B any x Effective Date If Yes , list NPA-NXX-X

Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (http://www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

Rena Butticaz
Signature of Block Applicant

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator s name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the TelcordiaTM LERGTM Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by TelcordiaTM Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLITM tandem of the facilities based provider xi. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes:

- ildentify the type of change(s) in Section 1.5.
- ii The Pool Administrator is available to assist in completing these forms.
- iii A CO Code application will also need to be submitted to the PA.
- iv Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).
- ^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM code of the switch /POI.
- vi Rate Center name must be a tariffed Rate Center.
- vii Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.
- viii Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).
- ix Select if you are the current Block Holder.
- x Select if you are not the current Block Holder
- xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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rw0052@att.c			Tim	e : 10/2	26/2011	05:11:1	2 PM F	DT				•	Sign O
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∐Individual Block	Appendix 3											May	16, 200
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Profile	E-mail: <u>rw00</u>	52@at	t.com										
	c												
	A. Available	Numbe	ers: 7257										
	B. Assigned	Numbe	ers: <u>1133</u>	<u>81</u>									
ļ	C. Total Numbering Resources: 20025 D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded for the Utilization calculation ² :0												
										ed from			
	List Excluded Code(s) or Block(s):												
	!	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
		#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12
	E. Growth History - Previous 6 months ³	34	49	<u>76</u>	<u>25</u>	<u>60</u>	-5						
	F. Forecast - Next 12 months ⁴	<u>40</u>	2040	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	40	<u>40</u>	40

	H. Months to Numbers Available for Assignment to Exhaust ⁵ Customers(A) = Average Monthly Forecast(G) Block Requested Available Numbers Months To Exhaust 1 7257 19.438 2 8257 19.438 1 Utilization Assigned Numbers(B) - Excluded Numbers(D) X 100 = 56.584 Total Numbering Resources(C)-Excluded Numbers(D)	aust
	Explanation:	
	¹ A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a coof this document.	ору
	2 Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from th administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2, and 1 code received =10,000).	e 000
	³ Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.	st
	⁴ Forecast of TNs needed in each following month, starting with the most recent month as Month #1.	
	⁵ To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be les than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).	s
	⁶ Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.1 (3)(ii))	5 (g)
	Back	
neustar	Question? Email us © 1997-2012 Neustar, Inc. Legal Notice	

	Pooling Administration System
rw0052@att.com (S	<u>-</u>
	Time : 10/26/2011 05:09:50 PM EDT
到 ⊕到Individual Block Requests ⊕图CO/NXX Code	Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued) ¹
Requests ⊞ ≦ Withdraw Pending Requests ⊞ ≦ Confirm	Your Utilization calculates to 56.584% . The FCC required the utilization of 75.000% . You have requested more blocks than you will exhaust in six months.
Resources In Service Donate Blocks	Select One Option and Submit
⊕ 🖺 Submit Forecast	Return to the Months To Exhaust Form
⊕ ≦ Search Forms	Need to request a State Waiver
⊞ ⊡ Reports	Received a State Waiver
⊕ ⑤ User Profile	
	Submit Cancel
neustar	Question? Emaît us © 1997-2012 Neustar, Inc. Legal Notice

COX, CINDY

F	rom	ı:

john.auerbach@neustar.biz

Sent: To: Wednesday, October 26, 2011 5:11 PM

Cc:

ANTELO, MARTA A; BUTTICAZ, RENA WILKIE

Subject:

PA_Part3@neustar.biz

PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 864-UNION-

SC-491175

Pooling Administration System

Dated 26-October-2011

November 21, 2003 ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation

	TB	PAG Par	t 3	•	
Tracking Number :	864-UNION-S 491175	SC-			
Date of Application:	10/26/2011		Effective Date:		
Date of Receipt:	10/26/2011		Date of Response	ə: <u> </u>	10/26/2011
Service Provider Name:	BELLSOUTH & TEL	TELEC	OMM INC DBA S	OUTH	ERN BELL TEL
(Telcordia [™] LERG [™] Routing Guide) OCN:	9417				
NPAC SOA SPID :					
Pooling Administrator Con John Auerbach	tact Informatio	n: Phone:			925-363-8706
Signature of Pooling Administration John Auerbach	strator	_Fax:			925-363-7684
Name (print) Email:		john.au	uerbach@neustai	<u>r.biz</u>	
NPA-NXX or NPA- NXX-X :			Bloc	k Assi	gned:
			Block	Rese	erved :
			Block Expira		ervation ate :
			Block Modifie	<td></td>	

Block/Code

	Disconnected :
Block Contaminated(Yes or No):	Violes
If Yes,enter the number of TNs contaminated :	
Switch Identification(Switch Entity/POI): 1	UNINSCMA42E
Rate Center:	UNION
Rate Center Sub Zone:	
X Form Complete, request denied.	
Explanation:	
DR-57: You do not meet the MTE and/or Utilization request for a new code is denied. You may proceed from the appropriate state commission using this F disagreement with the disposition of this request, p Thousands'Block Number (NXX-X) Pooling Administraces.	d with requesting a State Waiver Part 3 denial. If you are in please refer to the
Request withdrawn.	
Explanation:	
Assignment activity suspended by the administrate Explanation:	or.
Remarks:	
¹ This is an eleven-character descriptor provided by the co-	uning ontitudes the number of a state of
¹ This is an eleven-character descriptor provided by the ow calls. This must be the CLLI [™] Location Identification code the Part 1A form (Telcordia, LERG ROUTING Guide and C Technologies, Inc.)	of the switching entity/POI shown on LLI are trademarks of Telcordia

STATE OF SOUTH CAROLINA)	
)	CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)	

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for SBC Internet Services, Inc. d/b/a AT&T Internet Services ("ATTIS") and that she has caused AT&T South Carolina's Petition for Review of Numbering Resources Determination in the Union Rate Center to be served by the method indicated below upon the following this November 2, 2011:

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NeuStar – NANPA
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Longwood, FL 32779-2327
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Nyfa M. Laney